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April 8, 2005

Federal Communications Commission
Office of Secretary

VIA HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

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**Re: Sully Telephone Association, Inc., and Reasnor Telephone Company, LLC
Joint Petition for Study Area Waiver, and Petition for Waiver of
Section 69.905(c) Definition of Average Schedule Company
CC Docket No. 96-45**

Dear Ms. Dortch:

On behalf of Sully Telephone Association, Inc., and Reasnor Telephone Company, LLC ("Reasnor Telephone"), and pursuant to FCC staff request, transmitted herewith is a spreadsheet detailing ICLS information related to the transaction.

Should you have any questions with respect to this matter, please do not hesitate to contact the undersigned at (202) 857-1707.

Respectfully submitted,



James U. Troup
Tony S. Lee

Counsel for Sully Telephone Association, Inc., and
Reasnor Telephone Company, LLC

Enclosure

cc: Gary Seigel (FCC)
Gary Neill

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Current and Projected ICLS Data for Sully and Reasnor

7/01/05 - 6/30/06 Test Period Calculations#	Current Sully ICLS	Current Sully ICLS	Projected Sully ICLS	Projected Sully ICLS	Projected Reasnor ICLS	Projected Reasnor ICLS
<u>Common Line Revenue Requirement</u>						
2005/2006 Common Line Revenue Requirement	\$412,914		\$358,128		\$45,828	
2005/2006 Universal Service Contributions	\$0		\$0		\$0	
Subtotal (Line 1 - Line 2)	\$412,914		\$358,128		\$45,828	
Pool Administration Expense Factor	0.013948		0.013948		0.013948	
2005/2006 Common Line Revenue Requirement (Line 3 + (Line 3 * Line 4))		\$418,673		\$363,123		\$46,467
<u>End User Subscriber Line Charge (SLC) Revenue</u>						
2005/2006 Forecasted Residential/Single-Line Business Lines	928		678		250	
Residential/Single-Line Business Rate	\$6.50		\$6.50		\$6.50	
2005/2006 Residential/Single-Line Revenue (Line 6 * Line 7) * 12	\$72,384		\$52,884		\$19,500	
2005/2006 Forecasted Multi-Line Business Lines	1,792		1,727		65	
Multi-Line Business Rate	\$9.20		\$9.20		\$9.20	
2005/2006 Multi-Line Revenue (Line 9 * Line 10) * 12	\$197,837		\$190,661		\$7,176	
2005/2006 Estimated SLC Uncollectibles	\$0		\$0		\$0	
2005/2006 SLC Revenue (Line 8 + Line 11 - Line 12)		\$270,221		\$243,545		\$26,676
<u>End User ISDN Port Revenue</u>						
2005/2006 Forecasted Number of ISDN BRI Arrangements	0		0		0	
Rate	\$2.23		\$2.23		\$2.23	
Subtotal (Line 14 * Line 15) * 12	\$0		\$0		\$0	
2005/2006 Forecasted Number of ISDN PRI Arrangements	0		0		0	
Rate	\$23.51		\$23.51		\$23.51	
Subtotal (Line 17 * Line 18) * 12	\$0		\$0		\$0	
2005/2006 Forecasted Number of DS1 Channel Service Arrangements	0		0		0	
Rate	\$23.51		\$23.51		\$23.51	
Subtotal (Line 20 * Line 21) * 12	\$0		\$0		\$0	
2005/2006 End User ISDN Port Revenue (Line 16 + Line 19 + Line 22)		\$0		\$0		\$0
<u>Special Access Surcharge Revenue</u>						
2005/2006 Forecasted Special Access Surchargeable Channels	0		0		0	
Rate	\$25.00		\$25.00		\$25.00	
2005/2006 Special Access Surcharge Revenue (Line 24 * Line 25) * 12		\$0		\$0		\$0
2005/2006 Long Term Support*		\$0		\$0		\$0
2005/2006 Interstate Common Line Support** (Line 5 - Line 13 - Line 23 - Line 26 - Line 27)		\$148,453		\$119,578		\$19,791
	Per Line/Per Month	\$4.55		\$4.14		\$5.24